

COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

CLERK USDC EDWI
FILED

2023 JUL -5 P 1:15

(Full name of plaintiff(s))

KEENAN T. KNIGHT

v.

Case Number:

(Full name of defendant(s))

(to be supplied by Clerk of Court)

Sheriff Danita Ball, Captain Hannah,

LT. Avery, Officer Taylor,

Officer T. Williams, Officer John Doe

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

Milwaukee County Jail, 949 N. 9th St, Milwaukee, WI 53203
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Sheriff Danita Ball
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

ADDITIONAL DEFENDANTS

3. Defendant Captain Hannah is a citizen of Wisconsin, and resides at Milwaukee County Jail, 949 N. 9th St., Milwaukee, Wisconsin 53203, and work for the Milwaukee County Jail
4. Defendant Lieutenant (Lt.) Avery is a citizen of Wisconsin, and resides at Milwaukee County Jail, 949 N. 9th St., Milwaukee, Wisconsin 53203, and work for the Milwaukee County Jail
5. Defendant Correctional officer Taylor is a citizen of Wisconsin, and resides at Milwaukee County Jail, 949 N. 9th St., Milwaukee, Wisconsin 53203, and work for the Milwaukee County Jail
6. Defendant Correctional officer T. Williams is a citizen of Wisconsin, and resides at Milwaukee County Jail, 949 N. 9th St., Milwaukee, Wisconsin 53203, and work for the Milwaukee County Jail
7. Defendant Correctional officer John Doe, is a citizen of Wisconsin, and resides at Milwaukee County Jail, 949 N. 9th St., Milwaukee, Wisconsin 53203, and worked for the Milwaukee County Jail

and (if a person) resides at Milwaukee County Jail, 949 N. 9th St, Milwaukee, WI 53203
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Milwaukee County Sheriff's Department
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

ON 5/31/2023, I Keenan T. Knight, plaintiff, was
incarcerated at the Milwaukee County Jail, Criminal
Justice Facility, located at 949 N. 9th St., in the city
and County of Milwaukee, State of Wisconsin.

On the above date, at approximately 5:20 pm, I
Keenan T. Knight, was housed in Unit 6B cell 36
of the Milwaukee County Jail. Correctional officer
Saavedra was the assigned officer working Unit 6B.
Upon conducting a walk through of the unit
officer Saavedra smelled smoke near the visiting
booth area and immediately ordered the entire

unit to lock in and notified his supervisor Lieutenant Avery of the situation. Approximately 15 minutes after being ordered to lock in officer Saavedra informed me that I had a no contact visit out on Floor Control. Once on Floor Control Lieutenant Avery accompanied by officer Taylor and officer Te. Williams informed me that I did not have a visit and that they would be conducting a search of my cell and I was placed in a no contact visiting booth on Floor Control. Very shortly after Captain Hannah and Sgt. Perry-Wright responded to unit 6B regarding this situation then returned to the area of Floor Control. At approximately 6:20 pm, Lt. Avery, officer Taylor, and officer Te. Williams returned to Floor Control. Lt. Avery informed me that they searched my cell and found four cigarettes and tobacco in my cell and that I'm being placed on administrative/disciplinary segregation status and I would be transferred from Unit 6B to Unit 4A. Lt. Avery requested that additional officers respond to the situation. Officer Te. Williams pulled out his taser pointing it at me as officer Taylor

* PLEASE SEE ADDITIONAL PAGES *

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STATEMENT OF CLAIM, CONTINUED

and 2nd unknown officer opened the no contact visiting booth door. Officer T.E. Williams stated to me if I make any move that he was going to tase me. As officer Taylor and 2nd unknown officer was attempting to place me in handcuffs attached to a restraint belt I adamantly requested to speak with Captain Hannah consistently. As my right hand was handcuffed I was pulled out of the visiting booth facing officer Taylor and unknown officer as they were attempting to place my left hand in the handcuffs. Officer T.E. Williams then holstered his taser and approached me from behind and reached around my body to grab the ripp restraint belt. As officer T.E. Williams pulled on the ripp belt in attempt to place it around my waist area officer Taylor and unknown officer pulled my hands while both cuffed in the handcuffs back towards them. Officer T.E. Williams then immediately grabbed my head wrapping his arms around my forehead and chin area and I was thrown down to the ground while handcuffed. At this point I felt unknown officers at my legs, mid section area, and head area holding me down. I felt unknown officer strike me twice hard in my lower stomach and mid section area and almost immediately after I heard unknown officer yell "taser, taser, taser, clear," and officer Taylor shot me with his taser in my left back and upper left buttock while I was down on the ground handcuffed as Lt. Avery and numerous officers stood over me.

As a result of the circumstances of the mentioned incident I Keenan T. Knight, the plaintiff in this matter is making a Fourteenth Amendment due process claim and seek damages for unnecessary excessive use of force, mental/emotional distress, and pain and suffering. claims against defendants are as follow

STATEMENT OF CLAIM, CONTINUED

1. Sheriff Danta Ball, in official and personal capacity, acting sheriff of Milwaukee County, acting under the color of law, failed to adequately supervise and train employees under her command; Failure to protect against unnecessary excessive use of force by employees
2. Captain Hannah, in official and personal capacity, employee of the Milwaukee County Jail, acting under the color of law, failed to adequately supervise employees under his command; Failure to avert the unnecessary excessive use of force by employees under his command; Failure to protect against unnecessary use of force by employees under his command
3. Lieutenant Avery, in official and personal capacity, employee of the Milwaukee County Jail, acting under the color of law, failed to adequately supervise employees under her command; Failure to avert the unnecessary excessive use of force by employees under her command; Failure to protect against unnecessary excessive use of force by employees under her command
4. Correctional officer Taylor, in official and personal capacity, employee of the Milwaukee County Jail, acting under the color of law, used unnecessary excessive force against plaintiff by tasing plaintiff while handcuffed on the ground; pain and suffering; mental/emotional distress
5. Correctional officer T. Williams, in official and personal capacity, employee of the Milwaukee County Jail, acting under the color of law, used unnecessary excessive force against plaintiff

STATEMENT OF CLAIM CONTINUED

6. Correctional officer John Doe, in official and personal capacity, Employee of the Milwaukee County Jail, acting under the color of law, used unnecessary excessive force against plaintiff by striking plaintiff in lower stomach abdomen area; pain and suffering; mental / emotional distress

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

The Plaintiff respectfully request and moves this Honorable Court to grant the plaintiff injunctive relief and grant plaintiff awards of nominal damages, compensatory damages, and punitive damages against the defendants in this cause as follows:

Defendant Sheriff Dante Bell, in official and personal capacity, Plaintiff seek injunctive relief asking this Honorable Court to order that new policy and procedures be instituted at the Milwaukee County Jail prohibiting the issuance of tasers to Correctional Officers only allowing Supervisory staff to possess tasers due to employees reckless disregard and use

* PLEASE SEE ADDITIONAL PAGES *

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RELIEF WANTED CONTINUED

of tasers against pre-trial detainees especially as a first step approach; Plaintiff seek nominal damages, Compensatory damages in the amount of \$ 200,000.00, and punitive damages in the amount of \$ 50,000.00

Defendant Captain Hannah, in official and personal capacity, plaintiff seek awards of nominal damages, Compensatory damages in the amount of \$ 200,000.00, and punitive damages in the amount of \$ 50,000.00

Defendant Lt. Avery, in official and personal capacity, plaintiff seek awards of nominal damages, Compensatory damages in the amount of \$ 200,000.00, and punitive damages in the amount of \$ 50,000.00

Defendant officer Taylor, in official and personal capacity, plaintiff seek awards of nominal damages, Compensatory damages in the amount of \$ 200,000.00, and punitive damages in the amount of \$ 50,000.00

Defendant officer T. Williams, in official and personal capacity, plaintiff seek awards of nominal damages, Compensatory damages in the amount of \$ 200,000.00, and punitive damages in the amount of \$ 50,000.00

Defendant officer John Doe, in official and personal capacity, plaintiff seek awards of nominal damages, Compensatory damages in the amount of \$ 200,000.00, and punitive damages in the amount of \$ 50,000.00

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 28 day of June 2023.

Respectfully Submitted,

Keenan J. Knight
Signature of Plaintiff

2021-016014
Plaintiff's Prisoner ID Number

Milwaukee County Jail, 949 N. 9th St.

Milwaukee, Wisconsin 53203
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE

☒ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.

☐ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.